



# Privacy Policy

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## 1. Introduction

A core part of FreshChain Systems Pty Ltd's (**FreshChain**) business is storing and using data to provide accurate information about the food you eat. As such, protecting your privacy is our number one priority.

FreshChain is bound by the Australian Privacy Principles (**APPs**) set out in the *Privacy Act 1988* (Cth) (Act). Personal information is defined in the Act as information or an opinion that may reasonably identify a person. This Privacy Policy sets out how FreshChain will manage the collection and storage of its customer's and other persons' personal information.

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## 2. Policy

### 2.1. How is information collected?

FreshChain generally collects personal information by users imputing information into our database and user's activity while using our services. Personal information may be collected verbally, in writing, by telephone, by email and through FreshChain's website, including by monitoring and recording these communications and interactions. Specifically, we may collect the following:

- All information you provide when you create a FreshChain account. This will include your name, email address and a password. You may also choose to add a phone number, company you work for or payment information to your account.
- All information from the content you create, upload, or receive from others;
- All information from the apps, browsers, and devices you use to access our services;
- Unique identifiers, browser type and settings, device type and settings, operating system, mobile network information including carrier name and phone number, and application version number.
- Information about the interaction of your apps, browsers, and devices with our services, including IP address, crash reports, system activity, and the date, time, and referrer URL of your request.
- information about your activity on our services
- information about your location
- Information about you from trusted partners, including certification bodies who provide us with information about potential and current customers of our business services, and security partners who provide us with information to protect against abuse.

### 2.2. How is information used?

Your personal information will be stored in FreshChain's systems (and those of FreshChain's service providers). FreshChain may use your information:

- For business purposes including to provide, administer and improve our products and services;
- provide you with relevant information based on your activity, such as a list of most commonly used functions, and features like assurance in provenance, supply chain traceability and improved local suggestions.
- verify your details;
- to maintain and update our records;
- to manage our relationship with you;
- to protect our lawful interests;
- in connection with suspected fraud, misconduct and unlawful activity under specific Australian legislation (including the Crimes Act (Cth) 1914, Customs Act (Cth) 1901, the Rail Safety National Law);
- in connection with acquisitions or potential acquisitions of our business;
- to communicate with you, for example respond to an email sent by you; and
- to gather demographic information about FreshChain's website visitor trends. We may not be able to do these things without your personal information. For example, we may not be able to provide our services.

FreshChain will not disclose your Personal Information to the public domain or public forums. FreshChain will not disclose any of your Personal Information in our services, such as your page or information displayed to other users, without your consent.

### **2.3. How do we protect personal information?**

FreshChain is committed to safeguarding personal information that you provide. A range of measures are undertaken to protect the security of data supplied from misuse, unauthorised access, modification or disclosure. Internally, strict controls and procedures are in place to ensure that the privacy and security of personal information provided to FreshChain is protected.

### **2.4. Sharing information with other organisations**

FreshChain may exchange personal information with:

- Other associated entities;
- Contractors and service providers which assist FreshChain;
- Third party lenders and FreshChain's insurers;

- Commission and other government agencies as required by law;
- Anyone authorised by an individual to whom personal information relates; and
- Solicitors and other parties where FreshChain is subpoenaed to provide the information.

FreshChain may disclose your personal information in the following countries: [TO INSERT]  
Australia.

### 2.5. Is the information we hold accurate?

Your Personal Information will be collected and stored at the time it is collected. You may update your Personal Information at any time. You should notify us of any incorrect Personal information. Reasonable steps are taken to ensure that your personal information is accurate, complete and up-to-date whenever FreshChain receives or uses it.

### 2.6. How can you access and correct personal information?

You may amend Personal Information by changing the information online where applicable. Otherwise, you may contact FreshChain directly via the contact details on our website. You may be asked to validate your identity.

FreshChain reserves the right to charge a fee for searching for and providing access to your information.

### 2.7. What are 'cookies' and how are they used?

Some of FreshChain's web pages use 'cookies'. A cookie is a small file that is transferred to your computer's hard drive when you visit a website for record keeping purposes. You can set your browser to notify you when you receive a cookie, so you can decide whether to accept it.

Cookies are used to track usage patterns on FreshChain's website to improve its functionality. The website will not store personal information such as email addresses or other details in a cookie.

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## 3. Complaint handling process

If you believe we have breached this policy or any of the APPs, please contact us directly via the contact details on our website. We take all complaints seriously. We aim to handle all complaints confidentiality and efficiently.

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## 4. Effect of Policy

This Privacy Policy may be reviewed and revised from time to time to take account of new laws and changes to our operations and practices. FreshChain reserves the right to modify or amend this Policy at any time. Despite this Policy, FreshChain may rely on certain exemptions under privacy laws including in relation to employee records.